boundary waters between Wisconsin and Minnesota does not imply concurrent ownership in the land under the water, or in the fish and game inhabiting the same, but applies only to persons or things connected with navigation. Dodge, J., *dissenting.*

Sovereign rights as regards ownership of the bed of the Mississippi River coincide with territorial boundaries. Therein the jurisdiction of each State is exclusive. Concurrent jurisdiction does not empower one State to extend its police power over the territory of another, regulating the sovereign property right of the latter to the fish therein. The concurrent jurisdiction provided for the adjoining States attaches to cases arising out of the commerce of the river but does not authorize the courts of a State to abate a nuisance in the river beyond the boundary line of that State. *Gilbert v. Mfg. Co.,* 19 Iowa 319; *Buck v. Ellenbolt,* 84 Iowa 394. Dodge, J., dissenting, suggests that there is no distinction between criminal and police legislation of the State addressed to the subject of catching fish, and police or criminal legislation relating to other subjects.

CIVIL RIGHTS—PLACE OF PUBLIC ACCOMMODATION—BOOTBLACK STAND.—BENKS V. BESSO, 81 N. Y. SUPP. 384.—Under Laws of New York, 1895, c. 1042, which provide that all persons shall be entitled to equal accommodations of hotels, barber shops, theaters, "and other places of public accommodation or amusement," the proprietor of a boot-black stand was *held* liable for the penalty imposed for breach of the above, because of his refusal to black the plaintiff's boots on account of his color. *Nash and McLennan, JJ., dissenting.*

An unlicensed billiard parlor is not a "place of public amusement or accommodation," *Commonwealth v. Sylvester,* 95 Mass. 247; neither is a drug store. *Cecil v. Green,* 161 Ill. 265. A skating rink has been held within the statute, *People v. King,* 110 N. Y. 418; but see *Bawlin v. Lyon,* 67 Ga. 536.

CONSTITUTIONAL LAW—REGULATING THE RATE OF WAGES—CLASS LEGISLATION.—STREET V. VARNEY ELECTRICAL SUPPLY CO., 66 N. E. 895 (IND.).—The minimum wage law of Indiana enacts that unskilled labor employed on any public work of the State or of any political division thereof shall receive not less than twenty cents an hour. *Held,* unconstitutional, in that by its agency a citizen may be deprived of his property without due process of law; and also, inasmuch as it applies only to "unskilled labor," it is class legislation.

Legislation of this kind has received no favor in the courts. In *People v. Coler,* 166 N. Y. 1, a statute providing that all laborers upon any public work should be paid "not less than the prevailing rate of wages," was held unconstitutional, and the court held broadly that the legislature has no more right to interfere and control by compulsory legislation the action of municipal corporations with respect to contract rights of exclusively local concern, than it has to attempt to regulate the question of wages as between private citizens. In *State v. Norton,* 5 Ohio N. P. 183, a city ordinance enacting that laborers should receive not less than $1.50 per day, was held unconstitutional.